



Environmental Protection Agency

1701 S. First Street Maywood, IL. 60153 791

312/345-9780

Refer to: 03104513 - Cook County - Chicago Heights/Columbia Tool Steel
ILD005144233

May 13, 1982

Mr. Bryan Boettger
Plant Manager
Columbia Tool Steel Company
400 E. Lincoln Highway
Chicago Heights, Illinois 60411

Dear Mr. Boettger:

On April 20, 1982, representatives of the Illinois Environmental Protection Agency (IEPA) conducted an inspection of your facility. This inspection was conducted by the Illinois Environmental Protection Agency under a Cooperative Arrangement with, and authorization of, the United States Environmental Protection Agency (USEPA). The purpose of the inspection was to determine your facility's compliance status with the Resource Conservation and Recovery Act (RCRA) of 1976, P.L. 94-580, as amended. During the inspection the following deficiencies were observed:

Pursuant to 40 CFR 265.16, the owner/operator is required to establish and maintain records relating to the training of personnel involved in hazardous waste management, including a description of the job title for each position at the site, a written job description, a description of training and records detailing the training given to each such individual. The owner/operator is deficient in that these were not available at the time of the inspection.

Pursuant to 40 CFR 265.73 the owner/operator must keep a written operating record at the facility. The operating record must include the following:

- 1) A description and the quantity of each hazardous waste received and the method(s) and date(s) of its treatment, storage or disposal at the facility as required by Appendix I.
- 2) The location and quantity of each hazardous waste within the facility including cross-references to specific manifest document numbers.
- 3) Records and results of waste analyses and trial tests.
- 4) Summary reports and details of all incidents that require implementation of the contingency plan.

- 5) Records and results of inspections.
- 6) Monitoring and testing data.
- 7) All closure cost estimates and for disposal facilities
all post-closure cost estimates.

Your facility is deficient in that an operating record was not maintained at the facility.

The owner/operator must have a contingency plan at the facility. The contingency plan must address the actions to be taken by facility personnel in response to fires, explosions, or any unplanned release of hazardous waste or hazardous constituents to the environment. The plan must describe the arrangements agreed to by local police, fire departments, hospitals and emergency response teams. The names, addresses, and phone numbers of all persons qualified to act as emergency coordinators must be included in the plan. The contingency plan must list all emergency equipment at the facility, including the location, a physical description, and a brief summary of the capabilities of each item on the list. In facilities where evacuation could be necessary a plan describing evacuation routes and signals used to begin evacuation must be included in the contingency plan. These requirements are pursuant to 40 CFR Part 265 Subpart D. Your facility is deficient in that the contingency plan on hand only listed the emergency coordinators and did not address the other requirements.

You are hereby requested to submit to this office, within 15 days of receipt of this letter, a description of steps taken to correct the above deficiencies. Failure to correct these deficiencies may result in enforcement actions initiated by USEPA pursuant to 40 USC 6928. Please send your reply to the above address. Should you have any questions concerning this matter, please contact Bonnie Eleder of my staff at the above number.

Sincerely,



Kenneth P. Bechely, Northern Region Manager
Field Operations Section
Division of Land Pollution Control

KPB:BLE:prb

Enclosure: Inspection Report

cc: Division File
Northern Region
U.S. E.P.A. - Region V

L P C F C O 5 5 C
(1) (8) (9)

OBSERVATION REPORT - SITE INVENTORY NO.

(11) (18)

CO. - L.P.C.

Region #

Date / /
(20) (25)Letter Sent (Yes or No)
(26)

(Location)

(Responsible Party)

Samples Taken: Yes () No () Time: From : m

Ground Water () Surface () Other () To : m

Photos Taken: Yes () No () Interviewed

Inspector
(27) (29)

Previous Inspection Previous Correspondence Site Open: Yes () No ()

OPERATIONAL STATUS:

TYPE OF OPERATION:

AUTHORIZATION:

Operating () Landfill () Storage () E.P.A. Permit ()

Temporarily Closed () Random Dump () Salvage () Variance ()

Closed Not Covered () Other () A.C.D. () 21(e) ()

Closed and Covered () Quantity Received Daily(1-6)
(30) Board Order ()Illegal (5) ()
(31)

IMPROVED

LPC 4 1/79 5,000

SAME

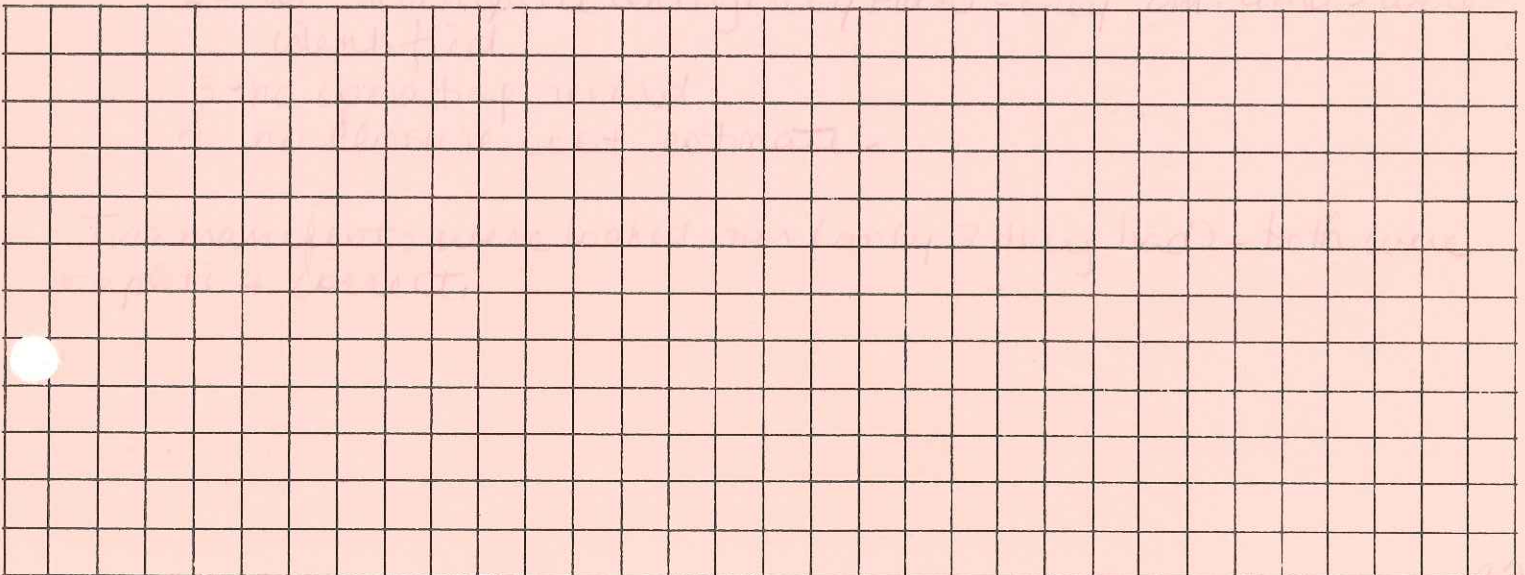
DETERIORATED

I S or D
(62)

GENERAL REMARKS:

INTERVIEW:

DIAGRAM:



03104513
STATE IDENTIFICATION NUMBER
(If Applicable)

ILD005144233
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

- (A) Facility Name: Columbia Tool Steel Company
(B) Street: 400 E. Lincoln Hwy.
(C) City: Chicago Heights (D) State: IL (E) Zip Code: 60411
(F) Phone: 312-757-5353 (G) County: Cook
(H) Operator: Columbia Tool Steel Company
(I) Street: 400 E. Lincoln Hwy.
(J) City: Chicago Heights (K) State: IL (L) Zip Code: 60411
(M) Phone: 312-757-5353 (N) County: Cook
(O) Owner: Columbia Tool Steel Company
(P) Street: 400 E. Lincoln Hwy.
(Q) City: Chicago Heights (R) State: IL (S) Zip Code: 60411
(T) Phone: 312-757-5353 (U) County: Cook
(V) Date of Inspection: 4-20-82 (W) Time of Inspection (From) 10:00am (To) 11:30am
(X) Weather Conditions: 52° sunny

(pg. 11-18, 21, 23 N/A)

(Y)	Person(s) Interviewed	Title	Telephone
	<u>Bryan Boettger</u>	<u>Plant Engineer</u>	<u>312-757-5353</u>
	_____	_____	_____
	_____	_____	_____
(Z)	Inspection Participants	Agency/Title	Telephone
	<u>Bryan Boettger</u>	<u>Plant Engineer</u>	<u>312-757-5353</u>
	<u>Bonnie Eleder</u>	<u>IEPA/EPs</u>	<u>312-345-9780</u>
	_____	_____	_____
	_____	_____	_____
(AA)	Preparer Information		
	Name	Agency/Title	Telephone
	<u>Bonnie Eleder</u>	<u>IEPA/EPs</u>	<u>312-345-9780</u>
	_____	_____	_____

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- | | |
|---|--|
| <p><input checked="" type="checkbox"/> A. Storage and/or Treatment</p> <p> 1. Containers (I)</p> <p> 2. Tanks (J)</p> <p> 3. Surface Impoundments (K)</p> <p> 4. Waste Piles (L)</p> <p>____ B. Land Treatment (M)</p> <p>____ C. Landfills (N)</p> | <p>____ D. Incineration and/or Thermal Treatment (O and P)</p> <p>____ E. Chemical, Physical, and Biological Treatment (Q)</p> |
|---|--|

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

Yes	No	NI*	Remark
-----	----	-----	--------

- (A) Has the Regional Administrator been notified regarding:

1. Receipt of hazardous waste from a foreign source?

X none

2. Facility expansion?

X none

- (B) General Waste Analysis:

1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?

X

2. Does the owner or operator have a detailed waste analysis plan on file at the facility?

X

3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?

X _____

- (C) Security - Do security measures include:
(if applicable)

1. 24-Hour surveillance?

~~X~~

2. Artificial or natural barrier around facility?

X fence

3. Controlled entry?

4. Danger sign(s) at entrance?

X

- (D) Do Owner or Operator Inspections Include:

1. Records of malfunctions?

X _____

2. Records of operator error?

X

3. Records of discharges?

X

1. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	<u>X</u>	<u>---</u>	<u>---</u>	<u>insp. done daily + weekl</u>
5. Safety, emergency equipment?	<u>X</u>	<u>---</u>	<u>---</u>	<u>guards keep log - do insp.</u>
6. Security devices?	<u>X</u>	<u>---</u>	<u>---</u>	<u>on rounds - only indicate</u> <u>problems</u>
7. Operating and structural devices?	<u>X</u>	<u>---</u>	<u>---</u>	<u>daily production report</u>
8. Inspection log?	<u>X</u>	<u>---</u>	<u>---</u>	<u>weekly maintenance rep</u>
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	<u>X</u>	<u>---</u>	<u>---</u>	<u>-----</u>
2. Job descriptions?	<u>X</u>	<u>---</u>	<u>---</u>	<u>-----</u>
3. Description of training?	<u>---</u>	<u>X</u>	<u>---</u>	} <u>nothing written - on the</u> <u>job training re</u> <u>handling of waste, safety</u> <u>emergency procedures</u>
4. Records of training?	<u>---</u>	<u>X</u>	<u>---</u>	
5. Have facility personnel received required training by 5-19-81?	<u>---</u>	<u>X</u>	<u>---</u>	
6. Do new personnel receive required training within six months?	<u>---</u>	<u>---</u>	<u>X</u>	<u>none</u>
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	<u>---</u>	<u>---</u>	<u>X</u>	<u>NA</u>
2. No smoking signs?	<u>---</u>	<u>---</u>	<u>X</u>	<u>NA</u>
3. Separation and protection from ignition sources?	<u>---</u>	<u>---</u>	<u>X</u>	<u>NA</u>

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

(A) Maintenance and Operation
of Facility:

Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

Yes No NI* Remarks

— X —

(B) If required, does the facility
have the following equipment:

1. Internal communications or
alarm systems?

X — —

2. Telephone or 2-way radios
at the scene of operations?

X — —

3. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

X — —

dust collected in sealed
roll-off box which is
connected by tube to

Indicate the volume of water and/or foam available for fire control: point of its generation

fire extinguishers

(C) Testing and Maintenance of
Emergency Equipment:

1. Has the owner or operator
established testing and
maintenance procedures
for emergency equipment?

X — —

2. Is emergency equipment
maintained in operable
conditions?

X — —

(D) Has owner or operator provided
immediate access to internal
alarms? (if needed)

X — —

(E) Is there adequate aisle space for unobstructed movement?

X

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:

Yes No NI* Remarks

1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
2. Arrangements agreed by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

X

have a partial plan -
only 10's emerg. coord.'s

X

by company nurse -
written

X

E.C. identified, but
only home phones
given

X

X

not necessary

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?		X		
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	X			
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	X			
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	X			
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?			X	none

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	X			
2. Are records of past shipments retained for 3 years?	X			
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	X			

VI. RECORDKEEPING - Continued

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

— X —

2. Does the operating record contain the following information:

- **b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

— X —

- c. The location and quantity of each hazardous waste within the facility?

— X —

- ***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

— NA —

- e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

— X —

- f. Reports detailing all incidents that required implementation of the Contingency Plan?

— — X —

none occurred

- g. All closure and post closure costs as applicable? (Effective 5-19-81)

— X —

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	<u>X</u>	—	—	_____
2. Has this plan been submitted to the Regional Administrator	—	—	<u>X</u>	_____
3. Has closure begun?	—	<u>X</u>	—	_____
4. Is closure estimate available by May 19, 1981?	—	<u>X</u>	—	_____
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)				<u>NA</u>

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: Columbia Tool Steel Co. Date of Inspection: 4-20-82

	Yes	No	NI*	Remarks
1. Are containers in good condition?	<u>X</u>	—	—	<u>7 cu. yd. sealed boxes</u>
2. Are containers compatible with waste in them?	<u>X</u>	—	—	_____
3. Are containers stored closed?	<u>X</u>	—	—	_____
4. Are containers managed to prevent leaks?	<u>X</u>	—	—	_____
5. Are containers inspected weekly for leaks and defects?	<u>X</u>	—	—	_____
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	—	<u>NA</u>	—	_____

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	---	---	X	1 waste only
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	---	---	X	N/A

J
TANKS

Facility Name: _____

Date of Inspection: _____

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	---	---	---	---
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	---	---	---	---
3. Do continuous feed systems have a waste-feed cutoff?	---	---	---	---
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?	---	---	---	---
5. Are required daily and weekly inspections done?	---	---	---	---
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	---	---	---	---
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)	---	---	---	---

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Are inspection procedures followed according to 265.403?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Are the special requirements fulfilled for ignitable or reactive wastes?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.2 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2 manifests waste shipped out every 6mo to 1 yr.
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Name, mailing address, telephone number, and EPA ID Number of Generator	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	<u>X</u>	—	—	_____
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	<u>X</u>	—	—	_____
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<u>X</u>	—	—	_____
6. The total quantity of waste(s) and the type and number of containers loaded?	<u>X</u>	—	—	_____
7. Required certification?	<u>X</u>	—	—	_____
8. Required signatures?	<u>X</u>	—	—	_____
(C) Does the owner or operator submit exception reports when needed?	—	—	<u>X</u>	<u>none needed</u>

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	—	—	<u>X</u>	<u>transporter empties boxes directly into his truck, which is correctly placarded</u>
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	—	—	<u>X</u>	_____
(C) If required, are placards available to transporters of hazardous waste?	—	—	<u>X</u>	_____

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	<u>X</u>	—	—	_____
(B) Has the generator submitted Annual Reports and Exception Reports as required?	<u>NA</u>	—	—	_____

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

	Yes	No	NI*	Remarks
Has the installation imported or exported Hazardous Waste?	—	<u>X</u>	—	_____

(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?	—	—	—	_____
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	—	—	—	_____
c. Met the Manifest requirements?	—	—	—	_____
2. Importing Hazardous Waste, has the generator:				
Met the manifest requirements?	—	—	—	_____

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

The Columbia Tool Steel Company manufactures tool steel bar products and castings. One hazardous waste is generated - listed as K061 - emission control dust from the primary production of steel in electric furnaces, or, baghouse dust. Baghouse dust is hazardous in that it has a high chromium content.

The facility has four 7 cubic yard sealed boxes which are used to store the waste. Three are in use at one time, with the fourth held on the side. The boxes are connected by flexible tube directly to the point of waste generation (the furnaces). Once full, they are sealed off. The storage area is the same as the generation area. Shipping out the waste every 6 months to a year, the facility notified for storage status. The transporter hauls the waste off site in a truck. The boxes are emptied into the truck; the boxes do not leave the facility.

The inspection showed the facility to be in ^{apparent} non-compliance for the following:

lack of written training program (employees receive on the job training)
an incomplete Contingency Plan (only Emergency Coordinators were identified)
no Operating Record
no Closure Cost Estimate.